

OES Air Technical Unit  
Inspection Report

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region I – New England

DRAFT DATE: July 18, 2012

FINAL DATE: July 26, 2012

SUBJ: Inspection of Eastern Color and Chemical Company in Providence, RI (Full Compliance Evaluation)

FROM: Abdi T. Mohamoud, Environmental Engineer, Air Technical Unit *AN 7/26/2012*

THRU: Christine Sansevero, Senior Enforcement Coordinator, Air Technical Unit *CMS 7/26/12*

TO: File

I. Facility Information

- A. Facility Name and Address:  
Eastern Color and Chemical Company  
35 Livingston Street, Providence, RI 02904
- B. Facility Mailing Address: Same as above
- C. Facility Contacts: Roger Lamoureux, Director of Quality Assurance  
(401) 331-9000
- D. Type of Permits and Date Issued: N/A
- E. AFS#: 44 007 77775

II. Background Information

- A. Date of Inspection: June 19, 2012
- B. Weather Conditions: sunny, 72 degrees F
- C. U.S. EPA Representative(s): Abdi T. Mohamoud
- D. State Representative(s): Rich Younkin
- E. Federally Enforceable Requirements Covered Reviewed During the Inspection:

- 40 CFR Part 63, Subpart FFFF - National Emission Standard for Hazardous Air Pollutants: Miscellaneous Organic Chemical Manufacturing
- 40 CFR Part 63, Subpart VVVVVV - National Emission Standard for Hazardous Air Pollutants for Chemical Manufacturing Area Sources
- 40 CFR Part 82, Subpart F

F. Previous Enforcement Actions: None.

### III. Purpose of Inspection

The purpose of this inspection was to determine whether the Eastern Color and Chemical Company facility in Providence, Rhode Island ("Eastern Color") is subject various federal regulations regarding chemical manufacturing.

### IV. Facility Description

Eastern Color is a manufacture of pigment dispersions, textile printing inks, flame retardants, water & oil repellents, fluorocarbons, fiber finishes, optical brighteners, and dye . The company has been providing chemicals and pigments to the leather, paper and textile industries since 1928.

### V. Inspection

#### A. Entry:

Mr. Mohamoud and Rich Younkin arrived at the facility at 9:00 AM and spoke with Roger Lamoureux, Plant Manager. The inspectors introduced themselves and presented their government credentials to Mr. Lamoureux. The inspection was unannounced and Mr. Mohamoud explained to Mr. Lamoureux that he was there to conduct Clean Air Act inspection of the facility and would be focusing its chemical manufacturing processes.

#### B. Opening Conference:

During the conference, Ken Johnson, Technical Manager, joined the inspectors and Mr. Lamoureux. Mr. Mohamoud asked if there were refrigeration units that use Class I and Class II refrigerant at Eastern Color. Mr. Lamoureux said there was one comfort cooling system but he did not know what type of refrigerant it was contained. Mr. Lamoureux called Eastern Color's refrigeration contractor. The contractor told him that the one system has two stages and each one of them contained 10 pounds of R22 type refrigerant.

Mr. Mohamoud asked if the facility has boilers. Mr. Lamoureux said there were two boilers that consume #4 oil.

Mr. Mohamoud asked if Mr. Lamoureux knew if Eastern Color uses, generates or produces one or more of the chemicals listed in Table 1 of 40 CFR Part 63, Subpart VVVVVV. Mr. Johnson

looked at Table 1 and said that Eastern Color uses about a five gallon bucket of Methylene Chloride each year but does not generate or produce any of the other chemicals listed in Table 1.

Eastern Color produces paints, coatings, adhesives, inks, certain polymers and resins. Mr. Lamoureux explained that the facility has three packed bed scrubbers. Some chemical reactions release fumes and the scrubbers are used to treat those fumes. The scrubbers have been in place for a long time (since 1984) and the facility did not have any paperwork on site regarding the scrubbers. Mr. Mohamoud asked how Eastern Color knows whether these scrubbers are working properly. Mr. Lamoureux said that these scrubbers have balls inside and that occasionally the maintenance person takes them out, cleans and puts them back.

Mr. Mohamoud asked how many companies were located at this site. Mr. Lamoureux said there were three other companies on the same site that are owned by the same owner of Eastern Color. These companies are Lenex Chemical, Joy Chemical, and Chemical Coading Corporation. Mr. Mohamoud then asked about two other facilities under Eastern Color located in Pawtucket and Woonsocket, RI. Mr. Lamoreaux said that both of them were closed about fifteen years ago. When Mr. Mohamoud asked why there were so many companies of different names located at this same site, Mr. Lamoureux said Eastern Color uses different names to sell its products to different clients.

Mr. Mohamoud asked if there were any emergency electrical generators at Eastern Color. Mr. Lamoureux said no. Mr. Mohamoud asked if there were any parts washing and Mr. Lamoureux said no.

Mr. Younkin, Rhode Island inspector, informed the Eastern Color representatives that the Rhode Island Department of Management did not receive 2011 Air Pollution Inventory from Eastern Color.

#### C. Facility Tour:

Mr. Mohamoud and Mr. Younkin were taken to the first floor where raw materials were stored. The raw materials were stored in 55 gallon drums. The inspectors continued to the second floor where mixing tanks and some more of raw materials were located. After that, the inspectors were taken to the roof to see the three scrubbers. The three scrubbers had no information on them and the Eastern Color representatives did not have any information regarding these three scrubbers. Mr. Lamoureux did say said that one of the scrubbers was broken and is no longer operable. The inspectors then were taken to the boiler room where two Cleaver Brooks boilers were housed.

Mr Mohamoud collected the following information from the two boilers:

Model#	Serial #	Fuel used	Input	Date Constructed
CB-655-125	L-40156	#4 oil	5.23 MMBtu/hr	8/29/1966
CB-439-200	L-51099	#4 oil	8.369 MMBtu/hr	10/28/1970

Mr. Younkin asked the facility to test the smoke alarms on the boilers. When tested, the smoke alarms did not sound.

D. Records Review:

Mr. Mohamoud reviewed a list of three years of chemicals purchased by Eastern Color. The list did not include any chemicals listed in Table 1 of 40 CFR Part 63, Subpart VVVVVV.

E. Multimedia Checklist

Mr. Mohamoud did not complete multimedia checklist.

F. Closing Conference

Mr. Mohamoud reiterated the reason for the inspection and thanked Mr. Lamoureux and Mr. Johnson for their assistance.